

Ronald J. Wronko (RW1859)
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Attorneys for plaintiff
Leena Varughese, M.D.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEENA VARUGHESE, M.D.,

Plaintiff,

v.

MOUNT SINAI MEDICAL CENTER,
PATRICK LENTO, M.D., CARLOS
CORDON-CARDO, M.D., ADOLFO
FIRPO, M.D., IRA J. BLEIWEISS,
M.D. and ABC Corp. 1-10, and JOHN
DOES 1 -10,

Defendants.

:
: Civil Action No. 12 cv 8812 (CM/JCF)
:
: ECF CASE
:
: CIVIL ACTION
:
: **NOTICE OF MOTION TO COMPEL IN**
: **CAMERA REVIEW AND**
: **PRODUCTION OF DOCUMENTS**
: **WITHHELD BY DEFENDANTS AS**
: **PRIVILEGED**
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TO: Rory J. McEvoy, Esq.
Edwards Wildman Palmer LLP
750 Lexington Avenue
New York, New York 10022

COUNSEL:

PLEASE TAKE NOTICE that upon the annexed Declaration of Ronald J. Wronko, Esq., sworn to on January 6, 2014 and the exhibit thereto; the accompanying memorandum of law; and all prior proceedings had herein, Plaintiff Leena Varughese

will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an order compelling in camera inspection and production of documents withheld by defendants based on privilege.

PLEASE TAKE FURTHER NOTICE THAT the plaintiff requests oral argument if the motion is opposed.

Dated: January 6, 2014
Florham Park, New Jersey

Respectfully Submitted,

RONALD J. WRONKO, LLC
Attorneys for plaintiff

By: 

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